

U.S. DISTRICT COURT  
WESTERN DISTRICT OF  
PENNSYLVANIA

DOCKET NO. 2:20-cv-1964

N.W.

CIVIL

Plaintiff,

NOTICE OF REMOVAL AND NOTICE OF  
MOTION

-against-

UNIVERSITY OF PITTSBURGH

**(1) REMAND FROM STATE COURT TO  
U.S. DISTRICT COURT and (2) AMEND  
COMPLAINT.**

Defendant.

PLEASE TAKE NOTICE, upon the Memorandum of Law in Support attached, Letter to Judge, Complaint, and all other filed documents, that the undersigned urgently move this Court (remotely either via tele-conference or video-conference), at the Courthouse, U.S. District Court, 700 Grant Street, Suite 3110, U.S. Post Office & Courthouse, Pittsburgh, PA 15219, on the 17th day of December 2020 at 11:00 am or as soon thereafter, to Remand Complaint from State Court to U.S. District Court in order for an Order to Show Cause in an EMERGENCY PRELIMINARY INJUNCTIVE RELIEF HEARING to overturn or even pause pending further hearings the adverse action taken by the Defendant against the Plaintiff on December 8, 2020 (December 10, 2020 notified via email). The IRREPARABLE HARM from the adverse action is real and does not cause any significant harm to the Defendant while a final decision pends. The Plaintiff also move the Court to amend the Complaint as well as exercise its judicial authority to provide any other reliefs that are just and reasonable.

Dated: Allegheny, Pennsylvania  
December 17, 2020

BY: N.W. , Pro Se  
/S/



**nw0354271@gmail.com**

CC:  
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*Attorney for Defendant University of Pittsburgh*

Lee M. Vapniarek, Esq.  
Judicial Law Clerk, Hon. Philip A. Ignelzi  
Room 820 City-County Building  
414 Grant Street,  
Pittsburgh, PA 15219